

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA §
§ No. 4:22-CR-287
v. §
§ JUDGE MAZZANT
ETHAN PERRY CHUNN §

FACTUAL BASIS

Investigation by the Federal Bureau of Investigation disclosed the following facts that establish that I, the defendant, **Ethan Perry Chunn**, committed the conduct described in Count 1 of the indictment, which charges a violation of 18 U.S.C. § 115(a)(1)(B) (threatening a federal official). I agree and stipulate that I am the same person charged in the indictment. I agree that the following factual basis is true and correct:

1. On June 24, 2022, in the Eastern District of Texas, I posted a series of threatening tweets to the social media platform, Twitter, threatening the United States Supreme Court and Texas Attorney General Ken Paxton. Specifically, I tweeted the following regarding the United States Supreme Court: “Does anyone know where the Supreme Court justices live?? Also does anyone know how to make a pipe bomb? Asking for a friend...Burn the Supreme Court to the fucking ground and don’t look back...Its time to kill Supreme Court Justices they don’t deserve to live.” I also stated the following to Ken Paxton on Twitter, “Where is your office I have a present I want to give you (it’s a bomb).”

2. I agree and stipulate that I posted these tweets with the intent to impede, intimidate, or interfere with the United States Supreme Court Justices while they were engaged in the performance of their official duties or with the intent to retaliate against them on account of the performance of their official duties.

3. I am pleading guilty to Count 1 in this case because I am guilty of the violation alleged. I have had an opportunity to consult with an attorney and I am satisfied with the advice and counsel provided to me. I acknowledge that these acts violated 18 U.S.C. § 115(a)(1)(B). I hereby stipulate that the facts described above are true and correct, and I accept them as the uncontested facts of this case.

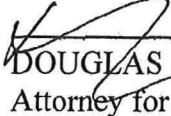
4. I have read this Factual Basis and acknowledge without reservation that it accurately describes the events and my acts which constitute violations of 18 U.S.C. § 115(a)(1)(B).

Dated: 10/13/23


ETHAN PERRY CHUNN
Defendant

I have reviewed this Factual Basis with the defendant. Based on these discussions, I am satisfied that he understands the terms and effect of the Factual Basis and that he has signed it voluntarily.

Dated: 10/13/23


DOUGLAS SCHOPMEYER
Attorney for Defendant